

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

IN RE:

PAUL A. CETNAR,

Chapter: 13  
Case No. 23-47486-lsg  
Hon. Lisa S. Gretchko

Debtor.

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**RESPONSE TO TRUSTEE'S  
MOTION TO DISMISS FOR FAILURE TO REMIT  
PROFIT SHARING AND/OR BONUSES UNDER CHAPTER 13 PLAN**

Debtor, Paul A. Cetnar, hereby responds to the Trustee's Motion to Dismiss for Failure to Profit Sharing and/or Bonuses Under Chapter 13 Plan as follows:

1. The allegations contained in paragraph one of the Motion are admitted as true.
2. Debtor neither admits nor denies the allegations contained in paragraph two because Debtor is without sufficient knowledge regarding same.

3. The allegations contained in paragraph three of the Motion are denied as untrue.
4. The allegations contained in paragraph four of the Motion are admitted as true.

WHEREFORE, Debtor requests that the Trustee's Motion to Dismiss for Failure to Profit Sharing and/or Bonuses Under Chapter 13 Plan be denied.

Respectfully submitted,

OSIPOV BIGELMAN, P.C.

Dated: June 24, 2024

By: /s/ Yuliy Osipov  
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